

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ESTATE OF STEVEN TYREL)	
ROSENTHAL, JR., Deceased, by)	Case No.
TERINICA THOMAS, His Guardian and)	
Independent Administrator of the Estate,)	
)	Judge
Plaintiff,)	
)	Magistrate Judge
v.)	
)	
P.O. JOHN DOE 1-3, Individually,)	JURY DEMAND
)	
Defendants.)	

COMPLAINT AT LAW

NOW COMES the Plaintiff, ESTATE OF STEVEN TYREL ROSENTHAL, JR., Decedent, by TERINICA THOMAS, his Guardian and Independent Administrator, by and through its attorneys, Gregory E. Kulis & Associates, Ltd., and complaining against the Defendants, P.O. JOHN DOE 1-3, as follows:

COUNT I – EXCESSIVE FORCE

1. This action is brought pursuant to the laws of the United States Constitution, specifically, 42 U.S.C. §1983 and §1988, and the laws of the State of Illinois, to redress deprivations of the Civil Rights of the Plaintiff, ESTATE OF STEVEN TYREL ROSENTHAL, JR., Decedent, accomplished by acts and/or omissions of the Defendants, P.O. JOHN DOE 1-3, committed under color of law.

2. Jurisdiction is based on Title 28 U.S.C. §1343 and §1331 and supplemental jurisdiction of the State of Illinois.

3. The Plaintiff, STEVEN TYREL ROSENTHAL, JR., Decedent, a Minor, was at all relevant times a United States Citizen and resident of the State of Illinois.

4. At all relevant times the Defendants, P.O. JOHN DOE 1-3, were duly appointed Chicago Police Officers acting within the scope of their employment and under color of law.

5. The City of Chicago is a statutory municipal corporation and the employer of the Defendants, P.O. JOHN DOE 1-3.

6. On August 17, 2018, the Decedent, STEVEN TYREL ROSENTHAL, JR., was in the vicinity of the 1500 Block of South Keeler Ave.

7. The Defendants, P.O. JOHN DOE 1-3 arrived in the vicinity based on a report of a man with a gun.

8. Reportedly the Defendants started to chase the Decedent, a Minor, STEVEN TYREL ROSENTHAL, JR., who was scared.

9. The Decedent, a Minor, STEVEN TYREL ROSENTHAL, JR., did not display a weapon.

10. The Decedent, a Minor, STEVEN TYREL ROSENTHAL, JR., did not threaten the Defendants with great bodily harm.

11. The Decedent, a Minor, STEVEN TYREL ROSENTHAL, JR., did not shoot a weapon at Defendants.

12. The Defendants, P.O. JOHN DOE 1-3 either shot the Decedent, a Minor, STEVEN TYREL ROSENTHAL, JR., or as a result of their actions seized him, causing his death by gunshot wound.

13. The Decedent, a Minor, STEVEN TYREL ROSENTHAL, JR., ultimately succumbed to his injuries and died.

14. At that time, the Defendants', P.O. JOHN DOE 1-3, use of force was excessive, unreasonable, and unnecessary.

15. The actions of the Defendants, P.O. JOHN DOE 1-3, were intentional, willful and wanton.

16. TERINICA THOMAS, the maternal aunt and Guardian of STEVEN TYREL ROSENTHAL, JR., a Minor, has sought to be named as Administrator of STEVEN TYREL ROSENTHAL, JR.'S Estate to redress the loss of STEVEN TYREL ROSENTHAL, JR.'S life.

17. The actions of the Defendants, P.O. JOHN DOE 1-3, were pursuant to the customs, policies, and practices of the Chicago Police Department.

18. The actions of the Defendants, P.O. JOHN DOE 1-3, violated the Plaintiff's constitutional rights as protected by 42 U.S.C. § 1983.

19. As a result of the actions of the Defendants, P.O. JOHN DOE 1-3, the Decedent suffered permanent injuries, pain, suffering, monetary loss, emotional distress and loss of enjoyment of his life.

WHEREFORE, the Plaintiff, ESTATE OF STEVEN TYREL ROSENTHAL, JR., by his Guardian and Independent Administrator, prays for judgement against the Defendants, P.O. JOHN DOE 1-3 for reasonable compensatory damages, punitive damages, plus attorney's fees and costs.

JURY DEMAND

The Plaintiff, ESTATE OF STEVEN TYREL ROSENTHAL, JR., Decedent, by TERINICA THOMAS, his Guardian and Independent Administrator, hereby requests a trial by jury.

(Signature Page Follows)

Respectfully submitted,

By: /s/ Gregory E. Kulis
Gregory E. Kulis & Associates, Ltd.

Gregory E. Kulis (No. 6180966)
Gregory E. Kulis & Associates, Ltd.
30 North LaSalle Street, Suite 2140
Chicago, Illinois 60602
p. (312) 580-1830 / f. (312) 580-1830